

## CFAC SLERA

### Detailed Comments

Section 3.1.2 (Page 19) – Terrestrial Pathways – Ingestion of surface water should be considered a complete pathway for terrestrial receptors. Screening of COPCs should be completed.

Section 3.3.1 (Page 21) – Persistent Bioaccumulative and Toxic Chemicals at the Site – It is unclear why the list of chemicals determined to be commonly present at the Site only includes PAHs. What is this finding based on? What about mercury? Lead?

Section 3.3.4 (Page 22) – Identified Exposure Pathways – It is suggested that a figure be created to summarize the site conceptual model for ecological exposures and how the various pathways are being evaluated.

Section 3.4 (Page 23) – Key Receptors – Semi-aquatic birds and mammals as well as reptiles should be included in the list of key receptors identified for the Site. These additions will impact later sections in the document as well (e.g., Section 3.5 Assessment Endpoints).

Section 4.0 (Page 25) – Identification of COPECs -This evaluation should also include an evaluation of detection frequency/detection limit adequacy relative to screening values. Evaluation by area assumes that the areas have been adequately characterized. Please provide an evaluation of data adequacy in terms of spatial and temporal representativeness of each area.

Section 4.1.2 (Page 26) – Surface Water – Were surface water samples analyzed for Biotic Ligand Model (BLM) parameters (temperature, pH, dissolved organic carbon (DOC), major cations (Ca, Mg, Na, & K), major anions (SO<sub>4</sub> & Cl), alkalinity, and sulfide)? What about other chemical groups that were evaluated for other media types?

Section 4.1.3 (Page 28) – ISM Sampling in the Operational Area – Please add mention of and reference to the explanation provided in the Phase I Data Summary Report regarding the field processing of samples. How was the field processing bias accounted for in the SLERA?

Section 4.2 (Page 28) – COPEC Screening Criteria – Please add criteria for evaluation of sampling adequacy. If the samples are not spatially and temporally representative of the area, it is premature to dismiss chemicals as COPECs for that area.

Section 4.3 (Page 31) – Background Analysis - Comments provided on the Phase I Data Summary Report regarding the evaluation of background data are applicable to this section. Also, please provide details for how upstream and site surface water data were compared to determine if concentrations measured in Site surface water appear to be Site-related. Chemicals should not be removed from future evaluation even if they are determined to be not Site-related. Background contribution to risk levels should be evaluated in the uncertainty assessment of a baseline risk assessment. This information is used by risk managers in risk management decision-making. It is premature to dismiss chemicals during this stage of the risk evaluation when limited data are available.

Section 4.4.1 (Page 32) – Sediment COPEC Selection - It does not appear that the lowest screening value has been selected or that all sources have been considered. To aid in the evaluation of the

selected screening values, please provide a table showing screening values from all sources and the selected screening value.

Section 4.4.2 (Page 33) – Surface Water COPEC Selection – Please clarify if total or dissolved fraction was used to compare to screening levels. Please clarify how hardness-dependent chemicals were evaluated. Was there an assumed hardness that was used? If so, how was the value selected? Please clarify if acute or chronic screening values are being used in the COPEC selection. It does not appear that detection limit adequacy is being evaluated as outlined in the SLERA. For example, in Table 5, mercury is not being carried through as a COPEC even though results were non-detect at a level that is more than two times the screening level. Similar to sediment, it does not appear that the lowest screening value has been selected or that all sources have been considered. To aid in the evaluation of the selected screening values, please provide a table showing the values from all sources and the selected screening value.

Section 4.4.3 (Page 35) – Soil COPEC Selection - Again, it does not appear that the lowest screening value has been selected or that all sources have been considered. To aid in the evaluation of the selected screening values, please provide a table showing the values from all sources and the selected screening value. Some of the soil tables do not result in a COPEC selection (e.g., Table 19). It is unclear what the potential COPECs are without doing a visual scan of the table of results and the screening values.

Section 5.3 (Page 43) – Uncertainties in the Effects Assessment (Discussion of use of the Maximum Concentration) - While the use of the maximum concentration may overestimate potential risks, it also has the possibility to underestimate the level of risk if the dataset is highly variable and sampling of the Site is not adequate. This should be noted in the text.

Section 6.0 (Page 46) – Conclusions (COPEC Refinement Investigation) – As stated earlier, because collected data are limited, the dismissal of chemicals as COPECs is premature. To further refine the “selection” at this point is also not appropriate without the collection of additional data so that the Site is properly characterized given the spatial and temporal variability that may be present.

### **Miscellaneous Comments**

It would be helpful to include an evaluation of seasonal flow data (USGS) to frame the representativeness of the surface water and sediment data upon which the SLERA is based.

Due to the known interaction of groundwater and surface water through seeps, groundwater data collected near the seeps should be screened for COPECs using the surface water screening criteria.